

ZETLIN & DE CHIARA, LLP

Attorneys for Defendant

Polshek Partnership LLP

801 Second Avenue

New York, New York 10017

Telephone: (212) 682-6800

Bill Chimos (BC-9381)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
HARTFORD FIRE INSURANCE COMPANY as
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES,
INC., F.J. SCIAME CONSTRUCTION CO., INC.,
POLSHEK PARTNERSHIP, LLP & CANTOR
SEINUK GROUP, INC.,

Defendants.
----- X

**DEFENDANT POLSHEK PARTNERSHIP LLP'S
RESPONSE TO MAYRICH CONSTRUCTION CORP. AND F.J. SCIAME
CONSTRUCTION CO., INC.'S NOTICE TO PRODUCE PURSUANT TO RULE 26**

Defendant Polshek Partnership LLP ("Polshek") by its attorneys Zetlin & De Chiara LLP, submits the following as and for its response to Defendants Mayrich Construction Corp. and F.J. Sciame Construction Co., Inc.'s Notice to Produce Pursuant to Rule 26, dated July 26, 2007:

TO ALL PARTIES:

Copies of any written report of an accident prepared in the regular course of business operations or practices of any person, firm, corporation or police officer unless disclosure of the police report would interfere with criminal prosecution or investigation.

RESPONSE:

Polshek objects to this request as overly broad, unduly burdensome and not reasonably tailored to lead to the production of admissible evidence. Notwithstanding these objections, Polshek will produce all non-privileged and relevant documents within its possession, custody or control that are responsive to this demand for inspection and copying at a mutually convenient time, to the extent consistent with the requirements of the FRCP.

Polshek reserves the right to amend its disclosures pursuant to the requirements of the FRCP.

Dated: New York, New York
August 23, 2007

ZETLIN & DE CHIARA, LLP

By: 

Bill Chimos (BC-9381)
*Attorneys for Defendant Polshek
Partnership LLP*
801 Second Avenue
New York, New York 10017
(212) 682-6800

TO: SEE SERVICE LIST